



Order Filed on October 8, 2024  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)  
UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
ANDREW R. VARA  
UNITED STATES TRUSTEE, REGIONS 3 & 9  
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*In re:*

Erika N. Jackson,

Debtor.

Case No. 22-19480 (ABA)

Chapter 7

Judge: Hon. Andrew B. Altenburg, Jr.

**CONSENT ORDER DENYING DISCHARGE**

The relief set forth on the following pages, numbered two (2) through four (4) is hereby **ORDERED**.

**DATED: October 8, 2024**

  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

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Debtor: Erika N. Jackson

Case No. 22-19480 (ABA)

**Consent Order Denying Discharge**

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THIS MATTER having been consensually opened to the Court and agreed upon by and between the United States Department of Justice, Office of the United States Trustee, Andrew R. Vara, the United States Trustee (“U.S. Trustee”), and the debtor, Erika N. Jackson (“Debtor”), appearing through her attorney, Jeffrey E. Jenkins, Esq., who asserts and avers that she reached an accord with the U.S. Trustee; and

WHEREAS, the U.S. Trustee and the Debtor, each through their respective counsel, present this Consent Order containing their acknowledgments and the terms of their accord; and

WHEREAS, the U.S. Trustee and the Debtor respectfully request that the Court accept, approve, and enter this Consent Order DENYING the Debtor a chapter 7 discharge pursuant to 11 U.S.C. § 727 for all debts incurred up to and including November 30, 2022, the date the instant case was filed; and

WHEREAS, the U.S. Trustee and the Debtor present to the Court this Consent Order in an effort to promote judicial economy, and to avoid further costs and risks of litigation; and

WHEREAS, this matter having been consensually agreed upon by and between the parties, and for good cause shown.

**ACKNOWLEDGMENTS**

1. The Debtor acknowledges that she caused a chapter 7 bankruptcy petition to be filed on her behalf in the United States Bankruptcy Court for the District of New Jersey on November 30, 2022, under bankruptcy case number 22-19480 (ABA); and
2. The Debtor acknowledges that the Schedules and Statement of Financial Affairs filed in support of her Petition did not disclose her pre-petition receipt of settlement funds or the underlying state court action.
3. The Debtor acknowledges her desire to resolve this matter without the need for further litigation, and without making any further admissions, she has chosen to consent to the relief the U.S. Trustee requested and to waive her chapter 7 discharge for any and all debts she incurred as of and prior to November 30, 2022; and

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5. The Debtor acknowledges that after consultation with counsel, she has chosen to waive any discharge in this case.

**TERMS**

For good cause shown, it is ORDERED that:

- a. The Debtor waives and shall be denied a chapter 7 discharge, pursuant to 11 U.S.C. § 727, for all debts incurred up to and including November 30, 2022, and any and all claims and liabilities against the Debtor up to and including November 30, 2022, including all claims listed on Schedule E/F of the Debtor's bankruptcy petition, and any subsequent amendments.
- b. The Debtor further waives all right to appeal the entry of this Consent Order, and the denial of her bankruptcy discharge.
- c. Should the Debtor or the Court reject this Consent Order for any reason, the parties shall be free to proceed to litigating the merits of the case as they see fit.
- d. The parties acknowledge and agree that this Consent Order contains the entire agreement between the parties.
- e. The parties further acknowledge and agree that the U.S. Trustee has not made, and/or given any other representations, promises, inducements, or rewards, and/or given or promised to give any other consideration of any kind whatsoever to the Debtor or anyone else on his behalf.
- f. This Consent Order does not affect the automatic stay and the closure of the bankruptcy case.
- g. This Consent Order, as entered by the Court, shall be filed by the Clerk in both the main case and adversary proceeding.

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**SIGNATURES**

The form and entry of this consent order is hereby acknowledged and agreed to:

Erika N. Jackson  
Debtor

By: /s/ Erika N. Jackson  
Erika N. Jackson  
Debtor

Date: 9/24/2024

Jenkins Law Group  
Attorney for Erika N. Jackson

By: /s/ Jeffrey E. Jenkins  
Jeffrey E. Jenkins, Esq.

Date: 9/24/2024

Without Objection:

Andrew R. Vara,  
United States Trustee  
Regions 3 & 9

By: /s/ Lauren Bielskie  
Lauren Bielskie  
Trial Attorney

Date: 10/2/2024